

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**[PROPOSED] ORDER GRANTING  
PLAINTIFF WAYMO LLC'S MOTION  
FOR RECONSIDERATION OF ORDER  
ON COMPREHENSIVE  
ADMINISTRATIVE MOTIONS TO FILE  
UNDER SEAL (DKT. 2685)**

1 Plaintiff Waymo LLC (“Waymo”) has filed a Motion for Reconsideration of Order on  
 2 Comprehensive Administrative Motions for File Under Seal (Dkt. 2685) (“Motion for  
 3 Reconsideration”).

4 Having considered the Motion for Reconsideration, and good cause to seal having  
 5 been shown, the Court **GRANTS** Waymo’s Motion for Reconsideration and **ORDERS** sealed the  
 6 portions of the documents listed below:

- 7 1. Sealing portions of the deposition transcript of Gregory Kintz, dated April 26, 2017  
 8 (previously filed at Dkt. 409-8), specifically those portions marked with green highlights  
 9 at 4:22–23; 5:6–7, 11–12, 14–15; 6:23; 7:18–19; and 8:15–16, 24 in the version filed  
 10 concurrently herewith as Exhibit A.
- 11 2. Sealing portions of the Rule 30(b)(6) deposition transcript of Pierre Yves-Droz, dated  
 12 August 3, 2017 (previously filed as Dkt. 1299-5), filed concurrently herewith as  
 13 Exhibit B.
- 14 3. Sealing portions of Defendants’ Response to Waymo’s Précis regrading Defendants’  
 15 Litigation Misconduct (previously filed as Dkt. 2477-4), specifically the portions marked  
 16 by the red box at 3:26–27, in the version filed concurrently herewith as Exhibit C.
- 17 4. Sealing portions of an email sent by Drew Bagnell, dated March 19, 2016 (previously  
 18 filed as Dkt. 1159-14), specifically the portions marked with green highlight in the  
 19 version filed concurrently herewith as Exhibit D.
- 20 5. Sealing portions of an email sent by Anthony Levandowski, dated April 30, 2016  
 21 (previously filed as Dkt. 1341-12), specifically those portions marked with green  
 22 highlights in the version filed concurrently herewith as Exhibit E, in addition to passages  
 23 previously granted sealing.
- 24 6. Sealing portions of an email sent by Anthony Levandowski, dated April 30, 2016  
 25 (previously filed as Dkt. 1526-23), specifically those portions marked with green  
 26 highlights in the version filed concurrently herewith as Exhibit F, in addition to passages  
 27 previously granted sealing.
- 28 7. Sealing portions of the Rebuttal Expert Report of Walter Bratic (previously filed as Dkt.

2275-4), specifically those portions marked with green highlight at ¶¶ 35, 48, 55, 108, 119, 211, 213, & 221 in the version filed concurrently herewith as Exhibit G, in addition to passages previously granted sealing.

8. Sealing portions of Plaintiff's Response to Discovery Order" (previously filed as Dkt. 2467-2), specifically the portions marked with green highlights at 4:6-7 in the version filed concurrently herewith as Exhibit H.

9. Sealing portions of an email from Brian Salesky, dated January 31, 2015 (previously filed as Dkt. 1336-11/1396-10), specifically the portions marked with green highlights in the version filed concurrently herewith as Exhibit I, in addition to passages previously granted sealing.

10. Sealing portions of an email sent by Drew Bagnell, dated March 19, 2016 (previously as Dkt. 2606-12), specifically the portions marked with green highlights in the version filed concurrently herewith as Exhibit J.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2019

\_\_\_\_\_  
WILLIAM H. ALSUP  
United States Magistrate Judge